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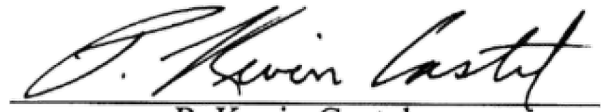
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December 31, 2023

Application GRANTED.
SO ORDERED.
Dated: 6/14/2024

BY ECF

The Honorable P. Kevin Castel
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007


P. Kevin Castel
United States District Judge

Re: *United States v. Kenneth Wynder and Andrew Brown*,
S1 20 Cr. 470 (PKC)

Dear Judge Castel:

[We represent defendant Andrew Brown in the above-captioned matter. In connection with Mr. Brown's Sentencing Submission and the exhibits thereto, filed today, we respectfully request permission to file portions of the Sentencing Submission (ECF 238) and Exhibit A (ECF 239-1 through 7) under seal and to file the entirety of Exhibit B (ECF 239-8) under seal. We make this request because: (1) portions of the Sentencing Submission and Exhibit A discuss sensitive information concerning a crime of which a member of Mr. Brown's family was a victim; and (2) portions of the Sentencing Memorandum and the entirety of Exhibit B include discovery materials designated Confidential by the Government (*see* Protective Order ¶ 4, ECF 54).]

In addition, we have redacted information in Exhibit A falling into the categories discussed in this District's policy concerning Privacy and Public Access to ECF Cases. We understand, pursuant to Your Honor's Individual Practices for Sentencing Proceedings, that we do not need to seek permission to redact information in those categories.

We are providing to Your Honor's Chambers and to the Government copies of this letter and the unredacted Sentencing Submission and exhibits thereto.

Hon. P. Kevin Castel

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Thank you for your consideration of this request.

Respectfully submitted,

/s/ Reed M. Keefe

Max Nicholas

Reed M. Keefe

Counsel for Defendant Andrew Brown